

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**BESSEMER SYSTEM FEDERAL CREDIT)
UNION,)**

Plaintiff,)

vs.)

**FISERV SOLUTIONS, LLC, f/k/a FISERV)
SOLUTIONS, INC., and FISERV, INC.,)**

Defendants.)

Case No. 2:19-cv-00624-RJC

**JOINT MOTION TO MODIFY SCHEDULE
REGARDING PLAINTIFF'S DISCOVERY MOTIONS**

Plaintiff Bessemer System Federal Credit Union (“Bessemer”) and Defendants Fiserv Solutions, LLC, f/k/a Fiserv Solutions, Inc., and Fiserv, Inc. (together, “Defendants”) hereby jointly move for an Order modifying the briefing schedule with respect to Bessemer’s Motion to Compel Fiserv to Provide Privilege Log for Communications After June 30, 2019, Motion to Compel Fiserv to Provide Responses to Bessemer's Second Request for Production, Motion to Compel Fiserv to Produce Documents Related to Security Audits, Motion for Protective Order Regarding Fiserv's Request of Bessemer's Voicemails, and Motion for Protective Order Regarding Fiserv's Request for Security Review Discovery (“Bessemer’s Discovery Motions”). In support of this Motion the parties state as follows:

1. On January 31, 2021, Bessemer filed its Discovery Motions. (Dkts. 154, 157, 161, 164 and 167.)
2. After conferring in good faith regarding the efficient management of this dispute, and for reasons of judicial efficiency and other good cause, the Parties hereby respectfully request that the Court enter an Order setting the following briefing schedule for Bessemer’s Discovery Motions:

a. Defendants shall file their responses to Bessemer's Discovery Motions on or before February 21, 2022;

b. Bessemer shall file its replies to Defendants' responses on or before March 11, 2022.

WHEREFORE, the Parties respectfully request that the Court enter an Order consistent with this Motion.

Dated: February 3, 2022

Respectfully submitted,

/s/ Charles J. Nerko

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